

Brooke E. Pietrzak (BP-7314)
Stephen M. Raab (SR-0742)
DORSEY & WHITNEY LLP
250 Park Avenue
New York, New York 10177
(212) 415-9200

*Attorneys for Defendant
Silver Dragon Resources, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALPHA CAPITAL ANSTALT,

Plaintiff,

vs.

SILVER DRAGON RESOURCES, INC.

Defendant

Case No. 07 CV 11430 (CM)

ECF CASE

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of Silver Dragon Resources, Inc.'s Motion to Set Aside Default Judgments; (ii) the Disclosure Statement Pursuant to Local Civil Rule 7.1; and (iii) the Affidavit of Marc Hazout, sworn to on February 5, 2008, and the exhibits thereto, defendant Silver Dragon Resources, Inc. ("Silver Dragon"), by its attorneys Dorsey & Whitney LLP, shall move this Court for an Order pursuant to Fed. R. Civ. P. 55(c) and 60(b)(1): (i) setting aside the Order Granting A Preliminary Injunction By Default that was entered against Silver Dragon on January 14, 2008; (ii) setting aside the Order that was also entered by default against Silver Dragon on January 25, 2008; and (iii) awarding Silver Dragon any other relief that the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that pursuant to the Individual Practices of Judge McMahon, Silver Dragon has not set a "return date" for this Motion.

Dated: New York, New York
February 5, 2008

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/Brooke E. Pietrzak

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